

ANCHORAGE WATER & WASTEWATER UTILITY

"A New Standard of Excellence"

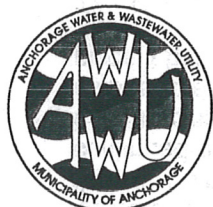
Treatment Division

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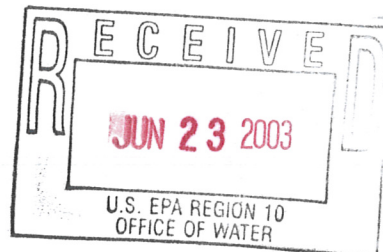
Anchorage



2002

*George P. Wuerch,
Mayor*

June 18, 2003



Ms. Rusty Gesin
Alaska Dept. of Environmental Conservation
Air Permits Program, 610 University Av.
Fairbanks, AK 99709

Dear Ms. Gesin:

Subject: Total Hydrocarbon Analyzer, Asplund Wastewater Treatment Facility

A major construction project is scheduled to commence at the referenced facility within the next 30 days. The project includes replacement of the existing influent bar screens and several other improvements related to the facility's headworks.

The project requires replacement of the intermediate level floor directly above the bar screens. The incinerator's Total Hydrocarbon Analyzer sits on that floor. Our consulting engineers have concluded that there is no practical means of moving the THC monitoring equipment to another location that will allow its continued operation throughout the duration of the project. Therefore, we have determined that we will have to disconnect the THC equipment and move it into storage while the project is underway. As soon as possible after the floor is replaced, we will move the THC equipment back into its existing location and place it back in service.

The Headworks Improvement Project is estimated to take approximately 18 months to complete. While we may be able to reinstall the THC analyzer prior to the end of the project we would not want to commit to a date sooner than that. Therefore, we expect the instrument to be out of service from approximately July 1, 2003 until December 31, 2004. During that time, AWWU will continue to operate all of the other emissions monitoring equipment on the incinerator, including the opacity monitor. We will continue to submit monthly opacity reports and semi-annual reports regarding the other operating parameters.

We should note that during all of the years the THC analyzer has been in operation, it has never recorded an actual violation of the THC limit, a monthly average exceeding 100 ppm. In fact the average THC recorded has been consistently less than 40 ppm. Therefore, considering that the remaining emission monitoring equipment will remain intact, we don't believe the inability to monitor THC during the project will have any negative effect on the environment.

Please feel free to contact me at the above phone number and address should you have any questions regarding this or other issues associated with our incinerator operation.

Sincerely,

J. Kris Warren
J. Kris Warren

Treatment Division Manager

cc: EPA Region 10